

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

KELLER BENVENUTTI KIM LLP
TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbbkllp.com)
DAVID A. TAYLOR (Cal. Bar No. 247433)
(dtaylor@kbbkllp.com)
THOMAS B. RUPP (Cal. Bar No. 278041)
(trupp@kbbkllp.com)
101 Montgomery Street, Suite 1950
San Francisco, California 94104
Telephone: (415) 496-6723
Facsimile: (650) 636-9251

*Attorneys for the Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re:

KS MATTSON PARTNERS, LP,

Debtor.

**DECLARATION OF EURIC RAMIREZ
IN SUPPORT OF ADEQUATE
ASSURANCE OF FUTURE
PERFORMANCE WITH RESPECT TO
THE ASSUMPTION AND ASSIGNMENT
OF EXECUTORY LEASES AND/OR
UNEXPIRED CONTRACTS IN
CONNECTION WITH THE SALE OF
905 BROADWAY STREET, FAIRFIELD,
CA 94533**

[No Hearing Requested]

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

1 I, Euric Ramirez, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) with respect to the assumption and
3 assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection with
4 the sale of the real property located at 905 Broadway Street, Fairfield, California 94533 (the
5 “Subject Property”), commonly known as Broadway Street Apartments, from the above-captioned
6 debtors and debtors-in-possession (collectively, the “Debtors”) pursuant to the Purchase and Sale
7 Agreement dated June 10, 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to
8 the *Notice of Sale of 905 Broadway Street, Fairfield, CA 94533*, filed concurrently herewith.

9 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based
10 upon my personal knowledge, my review of relevant documents, information provided to me, or
11 my opinion based upon experience, knowledge, and information concerning my finances. If called
12 upon to testify, I would testify to the facts set forth in this Declaration.

13 3. I am the purchaser of the Subject Property.

14 4. I am an experienced multifamily owner and operator who currently owns multiple
15 multifamily assets, including several in Solano County. I am experienced in management,
16 operations, and repair and capital improvement projects. My residence is located close to the
17 Subject Property.

18 5. I have the experience, financial resources, stability, and cash flow from other
19 properties and employment to successfully manage and run the Subject Property and to assume
20 the Agreements. I have no excessive debt and have positive monthly cash flow from my
21 investments.

22 6. I have reviewed the financial information for the Subject Property provided by the
23 Debtors, and I am capable of meeting the financial obligations of the Agreements.

24 7. I am willing and able to perform my obligations under the Purchase Agreement and
25 the assigned Agreements.


26 ///

27 ///

28 ///

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3
4 Dated: 7/30/2025

DocuSigned by:

/s/ 733F13A4B0E846E...
Euric Ramirez

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104